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July 13, 2011

VIA ECF

The Honorable Brian M. Cogan
United States District Court
Eastern District of New York
Brooklyn, NY 11201

Re: United States of America v. Thomas Gioeli, *et al.*
Case No. 08-cr-240 (S-6) (BMC) (RER)

Dear Judge Cogan:

I am counsel for Thomas Gioeli along with Carl J. Herman in the above matter. I am writing to request a rescheduling of the status conference in this case currently set for Wednesday, August 3rd, at 10:00 am. The government and counsel for co-defendant Dino Saracino do not object to this request.

At the time that we initially scheduled the status conference, I neglected to consider that Wednesdays are visitation days for Mr. Gioeli and his family. I want ensure his appearance at the next conference and therefore wish to avoid any conflict that may interfere with that happening. To that end, I have also been conferring with MDC Warden and United States Marshals Service to address other issues raised at the last conference regarding Mr. Gioeli's appearance and believe that matter has now been resolved.

The Honorable Brian M. Cogan

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I hope that the Court can shift the conference to either Tuesday, August 2nd, or Thursday, August 4th. I want to thank the Court in advance for its consideration of this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Adam D. Perlmutter", with a stylized, flowing script.

Adam D. Perlmutter

Cc: All counsel (via ECF)
Thomas Gioeli